

REMARKS

The Non-Final Office Action mailed April 15, 2009 considered claims 1-7, 9-41. Claims 1-7, 9-37 were rejected under 35 U.S.C. 103(a) as being unpatentable over Liddy et al. (US 6,006,221) hereinafter *Liddy*, in view of Park et al. (US 6,064,951) hereinafter *Park*. Claims 38-41 were rejected under 35 U.S.C. 103(a) as being unpatentable over *Park* in view of *Libby* and further in view of Aityan (US 2002/0169592) hereinafter *Aityan*.

By this amendment, claims 1, 10-12, 17, 20-27, 30, 32, and 33 are amended.¹ Claims 3, 15, 16, 29, 31, and 34-41 are cancelled. Accordingly, claims 1, 2, 4, 5-7, 9-14, 17-28, 30, 32, and 33 are pending, of which claims 1, 22, and 28 are the independent claims at issue.

The invention is generally directed to multilingual database interactions. Claim 22, for example, recites a method for querying data stored in a data store in a base system language and that is queryable using a specified query format. Claim 22 recites receiving a language selection. The language selection specifies a language form among one or more other different languages, the language selection being an indication that queries are to be entered and data presented in the specified language. The base system language and the one or more other different languages each correspond to a language that humans use to verbally transfer information to one another.

A query is received. The query is in the specified language and in a query format other than the specified query format. The received query is converted into the specified query format in the base system language. Query conversion includes converting the received query from the specified language into the base system language. Query conversion also includes converting the received query in the base system language into the specified query format in accordance with query definition rules that specify query syntax and semantic information for the specified query format subsequent to converting the received user query into the base system language. The converted query is submitted to the data store.

A query response is received. The query response contains stored data in the base system language. The stored data is responsive to the converted query from the data store, the stored data in the base system language. The stored data is translated from the base system language to the specified language. Translation includes referring to a language specific translation table to

¹ Support for the amendments to the claims is found throughout the specification and previously presented claims of U.S. Pat. Publ. No. 2005/0177358, including but not limited to paragraphs [0032]-[0042] and Figures 1-6.

statically translate portions of the stored data. Translation also includes for any portions of the stored data for which static translation is insufficient, dynamically translating the portions of the stored data through reference to an inference component. Translation also includes utilizing context information to provide an accurate translation that conforms to proper punctuation, syntax, and semantics of the selected language. The stored data is provided to an interface in the specified language.

Claim 28 is a computer readable medium corresponding to the method claim 22.

Claim 1 is a system claim similar to claim 22.

Applicants respectfully submit that the cited art of record does not anticipate or otherwise render the amended claims unpatentable for at least the reason that the cited art does not disclose, suggest, or enable each and every element of these claims.

Liddy describes a multilingual document retrieval system. Documents in a database are subjected to a set of processing steps to generate a language-independent conceptual representation of the subject content of the document. Likewise, received queries are processed to generate a language-independent conceptual representation of the subject content of queries. Documents and queries are matched based on the conceptual-level contents. (Col. 2, l. 55 – Col. 3, l. 14). However, *Liddy* fails to address (as recited in claim 22):

- receiving a language selection, the language selection specifying a language from among one or more other different languages, *the language selection being an indication that queries are to be entered and data presented in the specified language, the specified language corresponding to a language that humans use to verbally exchange information;*
- *converting the received query into the specified query format in the base system language, the base system language corresponding to a second different language that humans used to verbally exchange information, including:*
- *converting the received query from the specified language into the base system language; and converting the received query in the base system language into the specified query format in accordance with query definition rules that specify query syntax and semantic information for the specified query format subsequent to converting the received user query into the base system language;*
- *referring to a language specific translation table to statically translate portions of the stored data; and for any portions of the stored data for which static translation is insufficient, dynamically translating the portions of the stored data through reference to an inference component*

The other art of record fails to compensate for the deficiencies of *Liddy*.

Accordingly, the cited art fails to teach or suggest, either singly or in combination:

receiving a language selection, the language selection specifying a language from among one or more other different languages, *the language selection being an indication that queries are to be entered and data presented in the specified language, the specified language corresponding to a language that humans use to verbally exchange information;*

...

converting the received query into the specified query format in the base system language, the base system language corresponding to a second different language that humans used to verbally exchange information, including:

converting the received query from the specified language into the base system language; and

converting the received query in the base system language into the specified query format in accordance with query definition rules that specify query syntax and semantic information for the specified query format subsequent to converting the received user query into the base system language;

...

receiving a query response containing stored data responsive to the converted query from the data store, the stored data in the base system language;

translating the stored data from the base system language to the specified language, including:

referring to a language specific translation table to statically translate portions of the stored data; and

for any portions of the stored data for which static translation is insufficient, dynamically translating the portions of the stored data through reference to an inference component; and

...

as recited in claim 22, when viewed in combination with the other limitations of claim 22. For at least this reason, claim 22 patentably defines over the art of record. For at least the same

reason, claim 28 also patentably defines over the art of record. For at least the same reason depend claims 23-27 also patentably define over the art of record.

Claim 1 includes limitations substantially similar to claim 22. As such, claim 1 patentably defines over the art record for reasons similar to claim 22. Claims 2, 4-7, 9-14, and 17-21 patentably define over the art of record at least for the same reason as claim 1.

In view of the foregoing, Applicant respectfully submits that the other rejections to the claims are now moot and do not, therefore, need to be addressed individually at this time. It will be appreciated, however, that this should not be construed as Applicant acquiescing to any of the purported teachings or assertions made in the last action regarding the cited art or the pending application, including any official notice. Instead, Applicant reserves the right to challenge any of the purported teachings or assertions made in the last action at any appropriate time in the future, should the need arise. Furthermore, to the extent that the Examiner has relied on any Official Notice, explicitly or implicitly, Applicant specifically requests that the Examiner provide references supporting the teachings officially noticed, as well as the required reason why one of ordinary skill in the art would have modified the cited references in the manner officially noticed.²

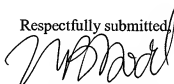
In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney at (801) 533-9800.

² Instead, Applicant reserves the right to challenge any of the purported teachings or assertions made in the last action at any appropriate time in the future, should the need arise. Furthermore, to the extent that the Examiner has relied on any Official Notice, explicitly or implicitly, Applicant specifically requests that the Examiner provide references supporting any official notice taken. Furthermore, although the prior art status of the cited art is not being challenged at this time, Applicant reserves the right to challenge the prior art status of the cited art at any appropriate time, should it arise. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status of the cited art.

The Commissioner is hereby authorized to charge payment of any of the following fees that may be applicable to this communication, or credit any overpayment, to Deposit Account No. 23-3178: (1) any filing fees required under 37 CFR § 1.16; and/or (2) any patent application and reexamination processing fees under 37 CFR § 1.17; and/or (3) any post issuance fees under 37 CFR § 1.20. In addition, if any additional extension of time is required, which has not otherwise been requested, please consider this a petition therefore and charge any additional fees that may be required to Deposit Account No. 23-3178.

Dated this 15th day of July, 2009.

Respectfully submitted,



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